REMARKS

This Application has been carefully reviewed in light of the Office Action mailed May 11, 2011. At the time of the Office Action, Claims 4-12 were pending in this Application, and Claims 1-3 and 13-18 were previously cancelled without prejudice or disclaimer. All pending Claims 4-12 were rejected in the Office Action. Applicant respectfully requests reconsideration and allowance of all pending claims.

Rejections under 35 U.S.C. §103

Claims 4-12 were rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over *Saka* (U.S. Patent No. 7,519,910) in view of *Maddalozzo* (U.S. 6,445,400).

Applicant respectfully traverses.

In order to establish a prima facie case of obviousness, the references cited by the Examiner must disclose all claimed limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). Even if each limitation is disclosed in a combination of references, however, a claim composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. *KSR Int'l. Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 1741 (2007). Rather, the Examiner must identify an apparent reason to combine the known elements in the fashion claimed. *Id.* "Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *Id.*, citing *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006).

Applicant submits that the proposed combination of *Saka* in view of *Maddalozzo* fails to teach a key feature of Applicant's claimed invention -- namely, the **causal relationship** between *moving the object* to the interaction area and *switching the display* from displaying at least a portion of the local object computer GUI to displaying the GUI of the processing computer. For example, Claim 4 recites "*in response to a user moving an object* from the portion of the assembled display belonging to the object computer to an interaction area of the portion of the assembled display belonging to the processing computer, *automatically causing the display belonging to the processing computer to switch* from displaying the at

least a portion of the local object computer GUI to displaying the local processing computer GUI and automatically generating an object processing platform."

In fact, the Examiner does not even allege that *Saka* in view of *Maddalozzo* teaches this key feature recited in the claims.

Respectfully, Applicant submits that the Examiner arbitrarily separates the action of *moving of the object* to the interaction area from the response of *switching between displayed GUIs*, and then maps these two separated steps onto the two separate references, thus neglecting the important -- and explicitly claimed -- causal relationship between the two steps. Further, Applicant confirms that *Maddalozzo* does not teach this causal relationship. That is, even if *Maddalozzo*'s teaching of *highlighting of windows* can be equated with switching a display from displaying at least a portion of a local object computer GUI to displaying a local processing computer GUI (which Applicant disagrees, as discussed below), *Maddalozzo* does not teach that the highlighting of windows occurs **automatically in response to a user moving an object**, much less in response to a user moving an object *from a portion of an assembled display belonging to one computer to an interaction area of another computer*, as explicitly recited in the claims. Rather, the window borders are automatically highlighted just before an impending timeout and closing of the window. Thus, the highlighting of windows is clearly not **in response to a user moving an object** -- in fact, the windows are highlighted *without any user interaction at all*. Thus, based on the above, Applicant submit that neither *Saka* nor *Maddalozzo* teach the key feature of switching the display from one GUI to another GUI **automatically in response to a user moving an object**.

Further, *Maddalozzo*'s teaching of switching **between two windows within the same GUI of one computer** cannot be equated with **switching from an assembled GUI of two computers to a GUI of one computer.** Thus, in addition to the lack of the causal relationship discussed above, *Maddalozzo* fails to teach "automatically causing the display belonging to the processing computer to **switch from displaying the at least a portion of the local object computer GUI to displaying the local processing computer GUI and automatically generating an object processing platform,**" as recited in Claim 4.

Finally, Applicant submits that the Examiner has not provided a sufficient rationale for modifying *Saka* based on *Maddalozzo*. "Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *Id.*, citing *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006). The only rationale provided by the Examiner is "...thus allowing the user to easily place focus on multiple windows displayed on a desktop (Maddalozzo, 5:32-45)." (Office Action, page 4). Applicant submits that the Examiner's rationale falls short of the required "articulated reasoning with some rational underpinning." For example, the Examiner provides no reasoning as to how "placing focus on multiple windows displayed on a desktop" would benefit *Saka*'s system. As another example, the Examiner provides no explanation of why a person of ordinary skill in the art would have found it obvious to add *Maddalozzo*'s feature of highlighting windows **that are about to timeout** to *Saka*'s system that **teaches nothing about windows timing out**. Applicant submits that a person of ordinary skill in the art would *not* have found this modification obvious, as *Saka*'s system has no need for such a warning system.

Thus, for at least the various reasons set forth above, Applicant respectfully submits that independent Claims 4, 7, and 10 are allowable over *Saka* in view of *Maddalozzo*. Accordingly, Applicant requests reconsideration and allowance of Claims 4, 7, and 10, as well as all claims that depend therefrom.

CONCLUSION

Applicant has made an earnest effort to place this case in condition for allowance in light of the remarks set forth above. Applicant respectfully requests reconsideration of the pending claims.

Applicant respectfully submits a Petition for One-Month Extension of Time. The Commissioner is authorized to charge the fee of $130.00 required to Deposit Account 50-4871 in order to effectuate this filing.

Applicant believes there are no other fees due at this time. However, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-4871 of King & Spalding LLP.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicant's attorney at 512.457.2030.

Respectfully submitted,
KING & SPALDING LLP
Attorney for Applicant

Eric M. Grabski
Reg. No. 51,749

Date: ___8/19/11___

SEND CORRESPONDENCE TO:
KING & SPALDING LLP
CUSTOMER ACCOUNT NO. **86528**
512.457.2030
512.457.2100 (fax)

16622988